



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JAN 31 1992

92-DOE-1097

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Dear Mr. Hestmark:

DOE/RFO received EPA comments, dated January 15, 1992, on the Final Operable Unit No. 3 Work Plan. DOE/RFO, EG&G, and their subcontractors found a number of EPA comments to be confusing. For example, in the first paragraph of your letter, you stated that "The majority of the document is well researched and describes a comprehensive and adequate remedial investigation program", and the last paragraph states "The required submittal of the revised Operable Unit No. 3 Work Plan is a result of submittal of an inadequate and incomplete Final RFI/RI Work Plan for Operable Unit No. 3." This sounds like comments on two different work plans. Thus, DOE/RFO followed your suggestion to contact EPA and CDH, and a meeting was held with your point of contact at EPA on January 24, 1992.

As a result of this meeting, a number of issues and EPA concerns were resolved and approaches to others were discussed. However, no agreement was reached on attached comment number 4, regarding airborne contamination, where EPA clarified that the Operable Unit No. 4 solar ponds are used as an example. EPA's position, as we understand it, is to use Operable Unit No. 3 sampling to achieve objectives not germane to Operable Unit No. 3. This is inconsistent with the Conceptual Model developed for Operable Unit No. 3 (which EPA had a great deal of input in crafting), is bad science, and will not achieve EPA's stated objectives. The objectives of the current air sampling program, based on the pathways identified in the conceptual model, are to assess the contaminant contributions to the air pathway from Operable Unit No. 3 sediments and soils. The current air program tentatively approved by EPA and CDH at the November 5, 1991, meeting, cannot possibly address comment number 4 without requiring major modifications of the work plan.

Data from sampling three miles away from a potential source, which may not exist, will contribute nothing to the Operable Unit No. 3 Work Plan, except cost. The highest values of a potential contaminant would be expected to occur closest to the source. If that source occurs at the solar ponds, for example, the sampling effort should begin at the solar ponds, which is an Operable Unit No. 4 issue and does not belong in comments to the Operable Unit No. 3 Work Plan.

An example of wind dispersed contamination that comes readily to mind is the ASARCO Smelter Superfund site in Tacoma, Washington. Large volumes of high arsenic ores were smelted at the facility for many years. Arsenic contamination via smoke stack emissions was dispersed over a wide area, with the highest levels of contamination closest to the sources and the lowest levels farthest from the stack.

ADMIN RECORD

A-0003-000063

As pointed out in the Operable Unit No. 3 Work Plan, Rocky Flats has no significant source on airborne contamination that has not been already identified in the work plan. In fact, CDH comments state "...the Dose Reconstruction Survey (the CDH/Chemrisk initiative), has decided that the possibility of measurable concentrations of the metal compounds of concern in the offsite superficial soils is very remote." If EPA is concerned about a potential source at an onsite Operable Unit, then good science would dictate that the place to begin looking for that potential contaminant is at that particular onsite source.

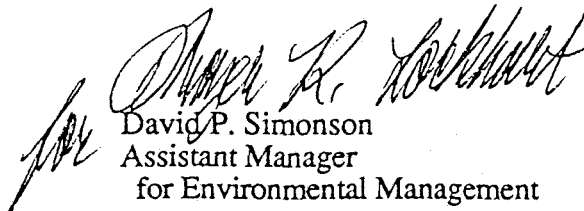
The Operable Unit No. 3 Work Plan should not be used as a vehicle to achieve extraneous goals and be burdened with activities that would only diminish the scientific integrity of the work plan.

DOE/RFO left the January 24, 1992, meeting with the perception that the aforementioned issues were not understood or appreciated by EPA. It would be helpful if these issues could be resolved prior to DOE/RFO's submittal of a revised Final Operable Unit No. 3 Work Plan so that an acceptable plan can be completed. We request that the February 28, 1992, date be revisited based on clarification of the issues described above.

Finally the statement that "epa (sic) will not consider the required resubmittal as good cause for extensions of subsequent Operable Unit No. 3 milestone dates" is unreasonable and unjustified. There exists valid technical issues and obvious lack of clarity in some areas. The DOE can not be forced to bear the full burden of time for a legitimate technical dialogue.

Questions should be directed to Robert H. Birk of my staff at 966-5921.

Sincerely,


David P. Simonson
Assistant Manager
for Environmental Management

cc:

A. Rampertaap, EM-453
J. Sparhawk, HAZWRAP
P. Bunge, EG&G
M. Guillaume, EG&G
B. Lavelle, EPA
J. Schieffelin, CDH